

PAMELA L. SCHULTZ (SBN 269032)
pamela.schultz@kennedyslaw.com
KENNEDYS CMK LLP
455 Market Street, Suite 1900
San Francisco, CA 94105
Telephone: 415-323-4463
Facsimile: 415-323-4445

Attorneys for Defendant
CAMP RICHARDSON RESORT, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SUZANNE NAVONE,

Plaintiff,

v.

ACTION WATERSPORTS OF TAHOE, CAMP
RICHARDSON RESORT, INC., M/V ROE
(A.K.A. M/V WATER TAXI), its engines,
tackle, equipment, furnishings, and machinery,
in rem, and MARK TAYLOR, JAMES
GRAHAM, *individuals* and Does 1-20,

Defendants.

Case No. 2:20-cv-01351-JAM-JDP

**STIPULATION RE DISMISSAL
WITHOUT PREJUDICE OF CAMP
RICHARDSON RESORT, INC.; ORDER**

Complaint Filed: July 6, 2020
Trial Date: TBD

NOW COMES Plaintiff SUZANNE NAVONE (hereinafter "PLAINTIFF") and defendant
CAMP RICHARDSON RESORT, INC. (hereinafter "CRR"), and hereby stipulate to the dismissal
of CRR without prejudice subject to the following conditions.

WHEREAS, the parties have had discussions regarding resolution of this matter and it is
believed the dismissal of CRR without prejudice will benefit those discussions, the parties have agreed
to the following stipulations and terms:

1. The parties agree to dismiss CRR without prejudice subject to being renamed upon
reasonable notice to counsel and a declaration to this Court.

2. CRR agrees that if it is renamed in this lawsuit, the naming of CRR in this or any lawsuit relates back to the date of filing of the Complaint in the captioned action and that it retains all other legal defenses, including the statute of limitations.

3. Upon final dismissal or judgment in this matter, CRR is also dismissed then with prejudice.

SO STIPULATED:

DATED: October 6, 2023

KENNEDYS CMK LLP

By: /s/ Pamela L. Schultz

PAMELA L. SCHULTZ

Attorneys for Defendant

CAMP RICHARDSON RESORT, INC.

DATED: October 6, 2023

BIRNBERG & ASSOCIATES

By: /s/ Cory A. Birnberg (authorized 10/6/23)

CORY A. BIRNBERG

Attorneys for Plaintiff

SUZANNE NAVONE

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED. The Court adopts the stipulation of the parties, and therefor orders the dismissal of Camp Richardson Resort, Inc., without prejudice subject to the terms of the stipulation.

Dated: October 10, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ

SENIOR UNITED STATES DISTRICT JUDGE